

**UNITED STATES U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ERIKA LEE,

*Plaintiff,*

v.

DELTA AIR LINES, INC., DAVID NEEDHAM  
& JOSE ROSADO,

*Defendants.*

Civil Action No. 1:22-cv-8618-DEH-RWL

**EXHIBIT G**

**TO**

**DELTA'S LETTER**

**DATED**

**APRIL 7, 2025**

2 UNITED STATES U.S. DISTRICT COURT

3 SOUTHERN DISTRICT OF NEW YORK

4 Civil Action No. 1:22-cv-8618-DEH-RWL

5 ERIKA LEE, :  
6 Plaintiff, :  
7 - vs - :  
8 DELTA AIR LINES, INC., DAVID :  
9 NEEDHAM and JOSE ROSADO, :  
10 Defendants. :  
11

12 April 4, 2025  
13 10:05 a.m.  
14 101 Park Avenue  
15 New York, NY

16  
17  
18  
19  
20 STATEMENT OF NON-APPEARANCE BY MICHAEL  
21 F. FLEMING, ESQ., held at the above-mentioned  
22 time and place, before Randi Friedman, a  
23 Registered Professional Reporter, within and for  
24 the State of New York.

ERIKA LEE  
APRIL 04, 2025

## STATEMENT ON THE RECORD

JOB NO. 1555789

	<p>Page 2</p> <p>1 Statement of Non-Appearance  2 APPEARANCES:  3 MORGAN LEWIS &amp; BOCKIUS, LLP  4 Attorneys for Defendants  5 101 Park Avenue  6 New York, New York 10178  7 BY: MICHAEL F. FLEMING, ESQ.  8 IMANI GUNN, ESQ.  9 * * *</p> <p>10  11  12  13  14  15  16  17  18  19  20 ALSO PRESENT:  21 Val Cometto, Esq.  22  23  24  25</p>	<p>Page 3</p> <p>1 Statement of Non-Appearance  2 MR. FLEMING: We're putting on the  3 record today that plaintiff, Erika Lee, has  4 not appeared for her noticed deposition.  5 The deposition was noticed on February 27th,  6 2025 for April 4th, 2025, today. That  7 notice was sent based on a representation  8 from Ms. Lee that she was available on  9 April 4th to be deposed.  10 Ms. Lee failed to respond to  11 several emails from Delta's counsel  12 regarding -- confirming today for the  13 deposition. Delta's in-house counsel, Val  14 Cometto, traveled to New York for the  15 purposes of attending this deposition and  16 has incurred costs related thereto.  17 Delta intends to seek costs for  18 the preparation and attendance of this  19 deposition from Ms. Lee. That's it.  20 (Time concluded: 10:07 a.m.)  21 * * *</p> <p>22  23  24  25</p>
	<p>Page 4</p> <p>1 Statement of Non-Appearance  2 C E R T I F I C A T I O N  3 I, Randi Friedman, Registered  4 Professional Reporter and Notary Public of the  5 State of New York, do hereby certify:  6 THAT, the witness whose testimony is  7 herein before set forth, was duly sworn by me,  8 and  9 THAT, the within transcript is a true  10 record of the testimony given by said witness.  11 I further certify that I am not related  12 either by blood or marriage to any of the parties  13 to this action; and that I am in no way  14 interested in the outcome of this matter.  15 IN WITNESS WHEREOF, I have hereunto  16 set my hand this day, April 4, 2025.  17  18   19 Randi Friedman, RPR  20  21  22  23  24  25 * * * * * * * * * * *</p>	

ERIKA LEE  
APRIL 04, 2025

## STATEMENT ON THE RECORD

JOB NO. 1555789

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